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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$49,900.00 IN
U.S. CURRENCY,

15 Defendant.
16

2:22-MC-00291-DAD-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant April
18 Medal (“claimant”), by and through their respective counsel, as follows:

19 1. On or about June 30, 2022, claimant filed a claim in the administrative forfeiture
20 proceedings with the Drug Enforcement Administration with respect to the Approximately \$49,900.00 in
21 U.S. Currency (hereafter “defendant currency”), which was seized on April 21, 2022.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
24 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
25 than the claimant has filed a claim to the defendant currency as required by law in the administrative
26 forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline is September 28, 2022.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
5 to November 28, 2022, the time in which the United States is required to file a civil complaint for
6 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
7 currency is subject to forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
10 alleging that the defendant currency is subject to forfeiture shall be extended to November 28, 2022.

11 Dated: 9/26/2022

PHILLIP A. TALBERT
United States Attorney

13 /s/ Kevin C. Khasigian
14 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

16 Dated: 9/26/2022

/s/ Thomas Chapin
THOMAS CHAPIN
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(Authorized by phone)

23 IT IS SO ORDERED.

24 Dated: September 26, 2022

Dale A. Dwyer
UNITED STATES DISTRICT JUDGE